

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KATHRYN JORDAN, *pro se*,

Plaintiff,

-against-

JUDGE JONATHAN LIPPMAN, JUDGE JUDITH  
KAYE, JUDGE LUIS GONZALEZ, JUDGE  
ROLANDO T. ACOSTA, JUDGE JAMES  
CATTERSON, JUDGE DAVID FRIEDMAN,  
JUDGE JOSEPH P. SULLIVAN, JUDGE PETER  
TOM, MARCY FRIEDMAN, JUDGE SHIRA S.  
SCHEINDLIN, JUDGE GEORGE P. DANIELS,  
JUDGE GERARD LYNCH, JUDGE RONALD  
ELLIS, SECOND CIRCUIT COURT OF APPEALS  
(c/o JUDGE RALPH WINTER & CLERK OF  
COURT), NEW YORK COMMISSION ON  
JUDICIAL CONDUCT, NEW YORK COUNTY  
CLERK, GREGORY HOMER, DONALD  
BESHADA, DRINKER BIDDLE & REATH LLP,  
KENNETH GAGE, PAUL HASTINGS, LAURENCE  
LEBOWITZ, KLEIN ZELLMAN, GARY PHELAN,  
WAYNE OUTTEN, OUTTEN & GOLDEN, DAVID  
M. FISH, ROSEN LEFF, VERIZON, GENERAL  
COUNSEL, WPP, GENERAL COUNSEL,

Defendants.  
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Case No. 09-cv-10616 (DAB)(THK)

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**DBR DEFENDANTS AND BATES’  
NOTICE OF MOTION TO DISMISS  
COMPLAINT WITH PREJUDICE**

PLEASE TAKE NOTICE that upon the annexed Declaration of Robert M. Leonard in Support of the DBR Defendants and Bates’ Motion to Dismiss, dated April 12, 2010, and the accompanying Memorandum of Law of the DBR Defendants and Bates in Support of Their Motion to Dismiss the Complaint, and the pleadings and prior proceedings herein, defendants Gregory Homer, Donald Beshada, Drinker Biddle & Reath LLP (the “DBR Defendants”) and defendants Bates Advertising USA, Inc. and Bates Advertising Holdings, Inc., f/k/a AC&R

Advertising, Inc., (improperly plead as “WPP, General Counsel,” a non-existent entity and collectively referred to as “Bates”), will jointly move this Court, before the Honorable Judge Deborah A. Batts at the United States Courthouse, 500 Pearl Street, Room 2510, New York, New York 10007 for an Order pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing Plaintiff’s Complaint with Prejudice.

Dated: April 12, 2010

DRINKER BIDDLE & REATH LLP

By: /s/ Robert M. Leonard  
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*Attorneys for Defendants Gregory Homer,  
Donald Beshada, Drinker Biddle & Reath  
LLP, Bates Advertising USA, Inc., and Bates  
Advertising Holdings, Inc. f/k/a AC&R  
Advertising, Inc., (improperly plead as  
“WPP, General Counsel,” a non-existent  
entity)*

To: Kathryn Jordan, *pro se*  
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Counsel of Record